



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

December 18, 1997

RE: DOE FEMP
CONDITIONAL APPROVAL:
PADDYS RUN EMBANKMENT
STABILIZATION WP & DESIGN

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed the DOE document, "Paddys Run Embankment Stabilization, Phase II: Transmittal of Work Plan and Conceptual Design" received on December 9, 1997. Ohio EPA approves of the proposed actions but believes revisions to the work plan are necessary. DOE should move forward with implementation. However, the following comments should be addressed by revisions to the work plan:

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: general Line #: Code: M
Original Comment #:
Comment: Comment: Ohio EPA believes the erosion which required this action is indicative of on-going erosional problems in Paddys Run. Many of the current problems with erosion are linked to historical modifications made to the stream and its drainages by the site. DOE should begin development of a comprehensive erosion control plan for Paddys Run. This plan could address short-term needs for erosion control while long-term issues of stream restoration can be developed under the Natural Resource Restoration Plan. The need to address erosion early is evident by the magnitude of the action required to stabilize the bank in the area of the K-65 silos.
- 2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: general Line #: Code: M
Original Comment #:
Comment: During implementation of the proposed action all effort should be made to minimize impacts on the riparian vegetation established along Paddys Run. This means minimizing the width of access corridors, exercising extreme caution near large trees, and limiting vegetation removal in the stream bed. In order to ensure appropriate restraint is being used, Ohio EPA would like to be notified prior to initiating action so that appropriate field oversight can occur.

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Additionally, as a schedule for field work is developed a draft copy would be appreciated.

- 3) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.3.3 Pg #: 1-6 Line #: 1-6 Code: C
Original Comment #:
Comment: The fence should be moved back at least 25 feet from the streambank to allow the establishment of riparian vegetation.
- 4) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.3.3 Pg #: 1-6 Line #: 15 Code: C
Original Comment #:
Comment: The text refers to the current condition the east bank of Paddys Run as being the result of natural erosion however the erosion of the east bank has been caused by modifications to the drainage of Paddys Run by the site. It is unknown whether this erosion would have ever occurred naturally. The specific modifications by the site include the diversion of the drainage from the north section of the site which used to enter Paddys Run just upstream of the current east bank erosion. This drainage was diverted into Paddys Run upstream of the railroad track during the construction of the waste pits. Paddys Run was also moved during the construction of the waste pits. These two actions have contributed to the forces impacting upon and eroding the east bank of Paddys Run in the vicinity of the silos.
- 5) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.3.4 Pg #: 2.2 Line #: 1-7 Code: C
Original Comment #:
Comment: It should be noted that all gravel will be removed from the road at the end of the remediation activities. Additionally it should be noted that the placement of the rip rap in the stream bed is a temporary measure to provide support to the stream bank for remediation of the silos and will be removed at the end of the silo remediation.
- 6) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.3.4 Pg #: 2-3 Line #: 25-29 Code: C
Original Comment #:
Comment: The maximum slope of the stockpile should be here. The slope should not exceed the ability of the soil to establish vegetation without slippage and should minimize velocity of flow down the slope sides to minimize erosion of the unprotected soils.
- 7) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.3.4 Pg #: general Line #: Code: C
Original Comment #:

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Comment: It should be noted that no equipment should be left in the 25 year flood plain when heavy rains are anticipated or when there will be no one present to remove the equipment in the case of unanticipated rain events. Paddys Run tends to rise very quickly in the case of a rain event.

If you have any questions, please contact me or Joe Bartoszek at (937) 285-6464.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandegrift, ODH
Manager, TPSS/DERR.CO
Francie Barker, Tetra Tech EM Inc.
Mark Shupe, HSI GeoTrans